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VIA ECF

March 6, 2018

The Honorable Michael A. Hammer, U.S.M.J. United States District Court for the District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

Re: WAG Acquisition, L.L.C. v. Sobonito Investments Ltd., et al. Civil Action No. 2:14-cv-1661 (ES)(MAH)

Dear Judge Hammer:

On behalf of Plaintiff WAG Acquisition, L.L.C. and Defendants Coolvision Ltd. and I.M.L. SLU in the above-referenced matter, we write jointly to inform the Court that the parties have completed jurisdictional discovery.

The parties propose the following briefing schedule for Defendants' motion to dismiss:

April 16, 2018

Defendants to file motion to dismiss

May 7, 2018

Plaintiff's response

May 21, 2018

Defendants' Reply, if any.

The parties ask that this Court approve the proposed briefing schedule.

Respectfully submitted,

SO ORDERED

Ari J. Jaffess

Lichael A. Hammer, U.S.M.J.

Date

3/9/2018

s/Michael A. Hammer